

PL Sum. J.

Ex. 031



Transcript of George Limbert Vol. I

Wednesday, April 27, 2022

W.K. v. Red Roof Inns, Inc

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Reference Number: 115455

UNITED STATES DISTRICT COURT

For the

NORTHERN DISTRICT OF GEORGIA

4

5 W.K., E.H., M.M., R.P., M.B., DP.,)

6 A.F., C.A., R.K., K.P., AND T.H.,)

7 Plaintiffs,)

8) Civil Action No.

9 vs.) 1:21-cv-04278-WMR

10)

11 RED ROOF INNS, INC., FMW RRI NC,)

12 LLC, VARAHI FRANCHISING, LLC; RED)

13 ROOF FRANCHISING, LLC;)

14 RRI WEST MANAGEMENT, LLC, VAHAHI)

15 HOTEL, LLC, WESTMONT HOSPITALITY)

16 GROUP, INC., and RRI III, LLC)

17 Defendants.)

18)

19 JANE DOE 1-4,)

20 PLAINTIFFS,)

21 vs.)

22)

23 RED ROOF INNS, INC., et al.,)

24 DEFENDANTS)

25)

1 The deposition of George Limbert, taken at the
2 instance of the Defendant pursuant to stipulations
3 contained herein; the reading and signing of the
4 deposition reserved before Leslie Kelso, Certified Court
5 Reporter, at 9:00 a.m., on April 27, 2022, at 600
6 Peachtree Street, Northeast, Suite 4700, Atlanta,
7 Georgia 30308.

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15 THE VIDEOGRAPHER: SUMMER MENKEE

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1 A. That's the best I can think of right now without
2 seeing it.

3 Q. Okay. You drew a distinction between prostitution
4 and sex trafficking earlier. Do you recall that?

5 A. Yes.

6 Q. What is the indicators, or indicia to use your
7 word, of sex trafficking?

8 A. An individual who is being held against their will
9 and forced to do something, whether it's perform sexual acts
10 or -- or forced labor.

11 Q. Well, how -- how do you -- how do you -- what signs
12 would indicate that, that you can tell me that the
13 franchisees should look for?

14 A. Well, it's a similar list to prostitution.
15 However, if the individual is being held against their will,
16 then that would constitute trafficking.

17 Q. How do you -- what are signs in the industry that
18 an individual is being held against their will to your
19 knowledge?

20 A. Well, someone who can't get away from their
21 trafficker.

22 Q. Well, how would you know?

23 A. Hopefully they would give you a sign that they
24 needed help. Or they would call the hotline. There is a
25 hotline for human trafficking, a general national hotline.

1 Q. Fair enough. I -- I was handed a question, so I'm
2 going to go back one step.

3 A. Okay.

4 Q. Who employed the staff at the affiliate managed
5 hotels like Red Roof North Druid Hills?

6 A. While it was affiliate managed?

7 Q. Yeah.

8 A. The staff were employees of Red Roof Inns Inc.

9 Q. Okay. When I say staff, I want to be clear on that.
10 General manager, housekeepers, maintenance, laundry, front
11 desk.

12 Q. They have all testified to that I would --

13 A. Yeah. Red Roof Inns Inc was their employer during
14 that period of time.

15 Q. Until when?

16 A. Until December 31 of 2020.

17 Q. And then that switched to --

18 A. But -- but let me clarify that. I'm very sorry.
19 Until -- until the Red Roof North Druid Hills was sold,
20 actually.

21 Q. Okay. Which is then?

22 A. No, I'm sorry. I gave you the wrong date. I
23 believe that Red Roof North Druid Hills was sold to a third-
24 party franchisee sometime in the summer of 2018 or 2019. I
25 don't exactly recall which date.

1 A. Oh. And specific -- and highlights specific
2 properties that need attention, yes.

3 Q. All right. So let's go to page 5255 this is --
4 well, you all have a copy of this.

5 A. Did you say 5255?

6 Q. Yes.

7 A. Okay.

8 Q. [REDACTED] [REDACTED]

9 [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED] [REDACTED]

16 MR. REED: Object to the form.

17 THE WITNESS: I -- I'm not certain I can answer
18 questions about this document as I asked that it be
19 prepared in anticipation of litigation.

20 BY MR. LAW:

21 Q. Doesn't it waive your privilege when you have third
22 parties sending it to you?

23 A. No. The third party was acting on my behalf.

24 Q. What's that?

25 A. The third party was acting on my behalf.

1 Q. Well, that doesn't matter. You have a privilege
2 with general third parties you are saying in this case?

3 A. I think the judge ruled that.

4 Q. The judge ruled that this to be produced to us this
5 Mon -- Monday.

6 A. But how can I answer questions about it if I
7 believe it's part of the attorney work product doctrine?

8 Q. Okay. Were you aware that the Smyrna properties
9 was one of the highest properties for prostitution in the Red
10 Roof system?

11 A. I believe that's privileged and work product.

12 Q. Yeah. Did you read this report?

13 A. Yes.

14 Q. So I guess we can at least agree at the time you
15 became aware of the Smyrna property was one of the highest
16 prostitution properties in the Red Roof system?

17 A. I -- I -- I'm not trying to -- I don't know if I
18 can answer these questions under the basis that this was
19 prepared in anticipation of litigation.

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED] [REDACTED] [REDACTED]

25 [REDACTED]

1 Q. And I know you told me that you got it and you read
2 it.

3 A. Well, I don't dispute that I read this at the time.

4 Q. Okay.

5 A. If that's okay.

6 Q. Exhibit 138?

7 A. Yes.

8 Q. Okay.

9 A. I just want to peruse it very quickly.

10 Q. Peruse it, but it's big, and again --

11 A. But yeah. This is -- yeah, yeah. And I don't want
12 to take the time to go through every single page, but yes. I
13 -- if you are purporting to me that this is the email and
14 attachment of that that was sent to Andy Alexander by Michele
15 Sarkisian, I have no reason to dispute that.

16 Q. Yes. Okay. Denise says I can tell you that --

17 (Cross talk.)

18 A. Okay. Sounds good. Sounds good.

19 Q. Okay. So you -- you are going to claim I assume
20 that anything you did in response to this memo would be
21 attorney-client privilege?

22 A. Yes.

23 Q. Because you anticipated litigation potentially?

24 A. And -- and I was providing advice in my capacity as
25 attorney for the organization.

1 BY MR. LAW:

2 Q. Well, I am allowed to ask hypothetical questions.

3 A. You sure can. But I -- I can't -- you are asking
4 me to -- you are not giving me enough facts to be able to
5 answer your question.

6 Q. I -- I disagree. But hypothetically if my client
7 was continued, and others, to be trafficked at that property,
8 was a mistake made? Can you answer that question or not?

9 A. I cannot answer that question.

10 Q. And given all of this knowledge that Ms. Sarkisian
11 put in this report, the reason that you didn't -- you don't
12 accept it as true, is because she didn't identify her source?

13 A. She provided me unverified information.

14 Q. And what kind of verified information would you
15 have wanted?

16 A. An affidavit. I would've liked to talk to her
17 sources. I would've liked to verify who they were.

18 Q. An affidavit from who?

19 A. Any investigator or police officer or off-duty
20 police officer. Whoever was involved in putting that report
21 together.

22 Q. Do you recognize that some of these people may not
23 want to be identified in order to continue to combat sex
24 trafficking?

25 A. I -- I am not aware of that because I didn't speak

1 Q. Where are you -- where is Red Roof in the
2 investigation at this point? If you are able to tell me.

3 MR. REED: Same objection. Privilege. Work
4 product.

5 BY MR. LAW:

6 [REDACTED] [REDACTED] [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED] [REDACTED]
10 [REDACTED] [REDACTED]

11 A. Yes.

12 [REDACTED]
13 [REDACTED] [REDACTED]
14 [REDACTED]

15 A. Yes.

16 Q. And then you can't tell me anything else that
17 transpired because you don't want to waive your -- the
18 attorney-client privilege?

19 A. That's correct.

20 Q. And did -- at the Atlanta trafficking site, was
21 Anthony shivers on there?

22 A. I don't recall.

23 Q. Do you recall anything from that?

24 A. I don't really have a good recollection of what was
25 on that site.

1 Roof.

2 Q. Is that a position where you have high turnover in?

3 Because I feel like I have heard a lot -- I keep asking who
4 is everyone, and it seems like there's a lot of safety and
5 security directors. Are there a lot of them or?

6 A. In my tenure at Red Roof, there has been two.

7 Q. Tom?

8 A. And Greg.

9 Q. Okay. Who ran at the safety and security
10 department between those two? There is a five-gap year, a
11 five-gap apparently years in between.

12 A. I don't believe that's accurate.

13 Q. How many years gap?

14 A. I think Tom departed from Red Roof around December
15 of 2013, and Greg would've started around May 2017. I'm not
16 doing the math well right now.

17 Q. That's okay.

18 A. And I don't think that's five years. Yeah.

19 Q. It's not five, but it's maybe three or four, maybe
20 two or three. I don't know. But so, who -- who served that
21 role in that time?

22 A. We approached safety and security from a committee
23 perspective.

24 Q. So there was no safety and security director?

25 A. Not during that period. Let me clarify. Not

1 THE WITNESS: Correct.

2 BY MR. LAW:

3 Q. But that's not the standard in the industry on how
4 to determine whether sexual trafficking is occurring, is it?
5 Having actually witnessing a sex act?

6 A. I don't know what -- I don't know what the standard
7 of the industry is to determine whether trafficking is
8 occurring at a hotel. You asked me about personal knowledge.

9 Q. The General Counsel and C -- or the president of
10 Red Roof Inn doesn't familiarize himself with standards of
11 industry as it relates to sex trafficking?

12 A. I am familiar.

13 MR. REED: You've got to let me --

14 THE WITNESS: Yeah. I'm sorry.

15 MR. REED: Object to the form. Now go ahead.

16 THE WITNESS: I am familiar with standards in the
17 industry as it relates to training on prevention of
18 trafficking.

19 BY MR. LAW:

20 Q. And so, is it your position then that the only way
21 that you can actually have knowledge -- personal knowledge
22 that sex trafficking is occurring is by witnessing a sex act?
23 That's my understanding you said?

24 MR. REED: Same objection.

25 THE WITNESS: Yes.

1

D I S C L O S U R E

2

3 STATE OF GEORGIA

Deposition of GEORGE LIMBERT

4 COUNTY OF FULTON

April 27, 2022

5

6 Pursuant to Article 8.B of the rules and regulations of the
7 Board of Court Reporting of the Judicial Council of Georgia,
8 I make the following disclosure:

9

10 I, Leslie A. Kelso, am a Georgia Certified Court Reporter. I
11 am here as an independent contractor for Trustpoint.One.

12

13 Trustpoint.One was contacted by Bondurant Mixon & Elmore,
14 LLP, to provide court reporting services for this deposition.
15 The firm will not be taking this deposition under any
16 contract that is prohibited by O.C.G.A. 15-14-37(a) and (b).

17



18
19 LESLIE A. KELSO, CCR

20

No. 5984-9847-4039-7056

22

CERTIFIED COURT REPORTER

23

24

25

1 C E R T I F I C A T E

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3 STATE OF GEORGIA)

4 COUNTY OF FULTON)

5

6 I, LESLIE A. KELSO, Certified Court Reporter for the

7 County of Fulton and for the State of Georgia, do hereby

8 certify:

9 That the foregoing transcript is a true and accurate
10 account of evidence and testimony taken by me in the matter
11 of W.K., E.H., M.M., R.P., M.B., DP., A.F., C.A., R.K., K.P.,
12 and T.H., and Jane Doe 1-4 versus RED ROOF INNS, INC., FMW
13 RRI NC, LLC, VARAHI FRANCHISING, LLC; RED ROOF FRANCHISING,
14 LLC; RRI WEST MANAGEMENT, LLC; VAHAHIHOTEL, LLC, WESTMONT
15 HOSPITALITY GROUP, INC., and RRI III, LLC, to the best of my
16 ability.

17 I further certify that the foregoing pages 9 through 328
18 of testimony represent a true and correct record of the
19 evidence given upon said plea;

20 And I further certify that I am not a relative by blood
21 or marriage, or an employee of attorney or counsel of any of
22 the parties in the case, nor am I financially or in no way
23 interested in the outcome of the action.

24 This May 12, 2022.

25



LESLIE A. KELSO, CCR

No. 5984-9847-4039-7056

CERTIFIED COURT REPORTER

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